

## MEMO ENDORSED

July 2, 2021

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The Honorable Edgardo Ramos  
United States District Court Judge  
Southern District of New York  
40 Foley Square, Courtroom 619  
New York, New York 10007

*Re: Tradeshift, Inc. v. Smucker Services Company, Case No. 1:20-cv-3661*

**Letter Motion to Seal Portions of Smucker's Letter Brief to Compel Tradeshift Financials and Exhibits A, B, D, E, F, and G**

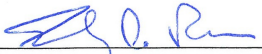
Dear Judge Ramos:

Pursuant to Rule 3(ii) of your Honor's Individual Practices, Defendant and Counter-Plaintiff Smucker Services Company ("Smucker") respectfully requests leave to seal portions of Smucker's Premotion Letter Brief to Compel Tradeshift Financials and Exhibits A, B, C, E, F, and G. Smucker is filing an under-seal copy and a publicly-redacted copy of that Letter Brief along with this letter motion to seal.

Smucker seeks leave to file portions of its Letter Brief and the above-mentioned exhibits under seal pursuant to the protective order entered in this case on November 19, 2020. (Doc No. 57.) Under that protective order, "a Party may not file in the public record in this action any Protected Material." (*Id.* at p. 15.) "Protected Material" includes any disclosure or discovery material designated as confidential or as highly confidential – attorneys' eyes only ("AEO"). (*Id.* at p. 3.) Smucker's Letter Brief includes information about Tradeshift's financials that was derived from documents and deposition transcripts marked confidential and AEO, including Exhibits A, B, D, E, F, and G. Moreover, the documents are submitted solely for the purposes of resolving a discovery dispute.

Accordingly, Smucker requests that the Court seal the redacted portions of Smucker's Letter Brief and Exhibits A, B, D, E, F, and G.

The application is   x   granted  
   denied

  
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Edgardo Ramos, U.S.D.J.  
Dated: 07/02/2021  
New York, New York

Respectfully,

TUCKER ELLIS LLP



CHELSEA MIKULA

CMT:smf